

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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UMG RECORDINGS, INC, CAPITOL  
RECORDS, LLC, CONCORD BICYCLE  
ASSETS, LLC, CMGI RECORDED MUSIC  
ASSETS LLC, SONY MUSIC  
ENTERTAINMENT, and ARISTA MUSIC

Plaintiffs,

v.

INTERNET ARCHIVE, BREWSTER  
KAHLE, KAHLE/AUSTIN FOUNDATION,  
GEORGE BLOOD, and GEORGE BLOOD,  
L.P.

Defendant.

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Civil Action No. 23-cv-7133

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**DECLARATION OF ALASDAIR MCMULLAN IN SUPPORT OF PLAINTIFFS'  
OPPOSITION TO DEFENDANTS' MOTION TO TRANSFER VENUE**

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I, Alasdair McMullan, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am Executive Vice President of Business & Legal Affairs at UMG Recordings, Inc. In my capacity as in-house counsel for UMG Recordings, Inc., among other things, I manage and supervise litigation for Plaintiffs UMG Recordings, Inc. ("UMG") and Capitol Records, LLC ("Capitol").

2. I submit this declaration in support of Plaintiffs' Opposition to Defendants' Motion to Transfer Venue. I have knowledge of the facts stated herein based on personal knowledge and my review of the documents and other items referenced herein. If called upon to do so, I am able to testify competently to the matters set forth below.

3. UMG and Capitol's headquarters and principal places of business are located at 2220 Colorado Avenue, Santa Monica, CA 90404.

4. UMG and Capitol have substantial ties to New York. UMG and Capitol are registered to do business in New York. UMG has approximately 500 employees across three offices in New York, New York. UMG's employees in New York include such functions, among others, as Business & Legal, Finance, Communications, Consumer Marketing, eCommerce, Content Protection, and Digital Operations.

5. Neither UMG nor Capitol maintain any offices in San Francisco, California.

6. The UMG and Capitol witnesses identified in Plaintiffs' Initial Disclosures are located as follows:

- a. I, Alasdair McMullan, am located in the greater Los Angeles, California area;
- b. Patrick Kraus is located in Nashville, Tennessee;
- c. Ken Druker is located in New York, New York.

7. I regularly travel to New York for purposes related to my employment at UMG. I do not regularly travel to San Francisco for purposes related to my employment at UMG.

I declare under penalty of perjury that the foregoing is true and correct.

  
ALASDAIR MCMULLAN

Executed on this 14 day of November 2023.